

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TODD J. HOLLIS,

Plaintiff,

vs.

TASHA C. JOSEPH, individually,  
and as owner and operator of  
DONTDATEHIMGIRL.COM,  
EMPRESS MOTION PICTURES,  
doing business as THE CAVELLE  
COMPANY, INC., CAROLYN  
MERITT LATTIMORE, ALESCIA  
ROSKOV, ANNA DOE, BARBARA  
DOE, CATHERINE DOE, DEBORAH  
DOE, and EMILY DOE,

Defendants.

CIVIL DIVISION

No.: GD 06-12677

Code: 008

**COMPLAINT IN  
CIVIL ACTION**

Filed on behalf of Plaintiff:  
Todd J. Hollis

Counsel of Record for  
the Plaintiff:

John R. Orie, Jr., Esquire  
Pa. I.D. #21972

ORIE & ZIVIC  
Firm No. 463  
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Pittsburgh PA 15219  
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**A JURY TRIAL DEMANDED**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY, PENNSYLVANIA

TODD J. HOLLIS,

Plaintiff,

vs.

TASHA C. JOSEPH, individually,  
and as owner and operator of  
DONTDATEHIMGIRL.COM,  
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Defendants.

) CIVIL DIVISION

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**NOTICE TO DEFEND**

YOU HAVE BEEN SUED IN COURT. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

**YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.**

**IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.**

**LAWYER REFERRAL SERVICES  
ALLEGHENY COUNTY BAR ASSOCIATION  
920 CITY-COUNTY BUILDING  
PITTSBURGH, PA 15219  
PHONE: 412-261-0518**

IN THE COURT OF COMMON PLEAS OF ALLEGHENY COUNTY,  
PENNSYLVANIA

TODD J. HOLLIS,	)	CIVIL DIVISION
	)	
Plaintiff,	)	No.: GD 06-12677
	)	
vs.	)	Code: 008
	)	
	)	
TASHA C. JOSEPH, individually,	)	
and as owner and operator of	)	
DONDATEHIMGIRL.COM,	)	
EMPRESS MOTION PICTURES,	)	
doing business as THE CAVELLE	)	
COMPANY, INC., CAROLYN	)	
MERITT LATTIMORE, ALESCIA	)	
ROSKOV, ANNA DOE, BARBARA	)	
DOE, CATHERINE DOE, DEBORAH	)	
DOE, and EMILY DOE,	)	
	)	
Defendants.	)	A JURY TRIAL DEMANDED

**COMPLAINT IN CIVIL ACTION**

AND NOW, the Plaintiff, Todd J. Hollis, by his attorneys, John R. Orie, Jr., Esquire and the law firm of Orie & Zivic, files the within Complaint in Civil Action:

**The Parties:**

1. The Plaintiff is Todd J. Hollis (Hollis), an adult individual residing at 715 N. Negley Avenue, Pittsburgh, Allegheny County, Pennsylvania 15206.

2. The Defendant, Tasha C. Joseph (Joseph), is an adult individual who maintains an address at 771 N.W. 48<sup>th</sup> Street, Miami, Florida 33127. Joseph is being sued individually and as the owner and operator of a website known as dontdatehimgirl.com located on the worldwide Internet.

3. The Defendant, Empress Motion Pictures, d/b/a the Cavelle Company, Inc. (Cavelle), is a Florida Corporation with offices at 771 N.W. 48<sup>th</sup>

Street, Miami, Florida 33127. Cavelle is the "Registrant" for the domain name of dontdatehimgirl.com.

4. Defendant Joseph is the Registered Agent and an officer and director of Defendant Cavelle.

5. The Defendant, Carolyn Meritt Lattimore (Lattimore), is an adult individual who resides at 471 Walnut Street, Blawnox, PA.

6. The Defendant, Alescia Roskov (Roskov), is an adult individual who resides at 531 Franklin Avenue, Pittsburgh, Allegheny County, Pennsylvania.

7. The Defendant, Anna A. Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

8. The Defendant, Barbara Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

9. The Defendant, Catherine Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

10. The Defendant, Deborah Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

11. The Defendant, Emily Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

**Background:**

12. Defendant Joseph is the founder, owner and operator of dontdatehimgirl.com, a website located on the worldwide Internet.

13. Joseph describes her website as the "most hated cheaters list" for men, and has likened it to the "FBI's most wanted list." According to Joseph:

“Any woman out there can post a picture and profile of a guy who’s cheated on them and it goes into a massive search engine.”

14. The dontdatehimgirl.com website currently contains “profiles” of more than 1,000 men, and receives more than 100 new submissions per day, according to Joseph. The website averages more than 200,000 visitors per day, and is growing.

15. The dontdatehimgirl.com website permits women to make anonymous postings about men who have allegedly “cheated on them.” Joseph candidly admits that the website does nothing to independently verify the information posted by the anonymous posters.

**The defamatory postings:**

16. The Plaintiff, Hollis, is a well-known and highly respected criminal defense attorney who practices in the greater Pittsburgh area.

17. Hollis has handled a number of high-profile cases in the local area and has also performed significant work in his local community. Hollis’ good reputation is essential to his occupation.

18. Hollis has an excellent reputation for honesty and integrity in both his business and personal affairs.

19. On or about May 24, 2006, the dontdatehimgirl.com website published an alleged “profile” concerning Hollis.

20. The “profile” was submitted by an anonymous poster, and included a picture of Hollis. Among other things, the “profile” falsely accused Hollis of having multiple children. The “profile” also falsely accused Hollis of having herpes. A true and correct copy of the “profile” is attached hereto as Exhibit “A.”

21. Hollis subsequently learned that the "anonymous poster" who published Exhibit "A" was the Defendant, Carolyn Meritt Lattimore.

22. In accordance with its customary practice, the dontdatehimgirl.com website did nothing to independently verify the information contained in the profile, and in fact it was false.

23. Upon learning of the posting, Hollis requested Defendant Joseph to remove it from the website. Despite several requests by Hollis and his attorney, Joseph adamantly refused to remove the defamatory statement from the website.

24. Hollis later learned that Defendant Lattimore voluntarily removed the posting approximately 36 hours after it was originally posted.

25. Shortly thereafter, the dontdatehimgirl.com website published a second "profile" concerning Hollis.

26. Again, the "profile" was submitted by an anonymous poster. Among other things, the "profile" falsely asserted that the poster "heard that Hollis was "gay," and "I'm quite sure that he is bi." A true and correct copy of the "profile" is attached hereto as Exhibit "B."

27. In accordance with its customary practice, the dontdatehimgirl.com website did nothing to independently verify the information contained in the profile, and in fact it was false.

28. Hollis subsequently learned that the "anonymous poster" who published Exhibit "B" was the Defendant, Alescia Roskov.

29. On or about May 31, 2006, the dontdatehimgirl.com website published a third alleged "profile" concerning Hollis.

30. Again, the "profile" was submitted by an anonymous poster. Among other things, the "profile" falsely stated that Hollis "gave me an STD." A true and correct copy of the "profile" is attached hereto as Exhibit "C."

31. Hollis does not currently know the identity of the individual who published Exhibit "C." However, Hollis intends to learn the identity of this anonymous poster during the discovery in this case.

32. In accordance with its customary practice, the dontdatehimgirl.com website did nothing to independently verify the information contained in the profile, and in fact it was false.

33. Shortly thereafter, the dontdatehimgirl.com website published a fourth "profile" concerning Hollis.

34. Again, the "profile" was submitted by an anonymous poster. Among other things, the "profile" falsely asserted that Hollis' "crib is a dump," that he "wears dirty clothes," and that he "complains about paying child support for his kids." A true and correct copy of the "profile" is attached hereto as Exhibit "D."

35. Hollis does not currently know the identity of the individual who published Exhibit "D." However, Hollis intends to learn the identity of this anonymous poster during the discovery in this case.

36. In accordance with its customary practice, the dontdatehimgirl.com website did nothing to independently verify the information contained in the profile, and in fact it was false.

## Count I

### Hollis v. Joseph

37. Plaintiff hereby incorporates paragraphs 1 through 36 above as if set forth in their entirety.

38. As the owner and operator of the dontdatehimgirl.com website, Joseph is responsible for the information contained on her website.

39. As set forth above, Joseph published false and defamatory statements regarding Hollis.

40. Among other things Joseph falsely stated that:

- A. Hollis has multiple children;
- B. Hollis has herpes;
- C. Hollis had transmitted an STD to an anonymous poster;
- D. Hollis was gay and or a bisexual; and
- E. Hollis' "crib is a dump," that he "wears dirty clothes," and

that he "complains about paying child support for his kids."

41. These statements constituted "defamation per se" under Pennsylvania law.

42. Joseph published the defamatory statements with knowledge of the falsity of the statements and/or with reckless disregard as to the truth of the statements.

43. Joseph failed to properly investigate the subject matter of the defamatory statements prior to publishing them.

44. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Joseph acted with actual malice.



45. Joseph refused to remove the defamatory statements from her website even after being notified that the statements were false, thus further demonstrating her malice in this case.

46. Joseph abused any and all conditional privileges which she might have been entitled to assert, by failing to use reasonable care and diligence to ascertain the truth, before publishing the false communications and by acting with actual malice.

47. As a direct and proximate result of Joseph's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

48. As a direct and proximate result of Joseph's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

49. As a direct and proximate result of Joseph's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

50. Joseph has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

## Count II

### Hollis v. Cavelle

51. Plaintiff hereby incorporates paragraphs 1 through 50 above as if set forth in their entirety.

52. As set forth above, Cavelle is the "Registrant" for the domain name of dontdatehimgirl.com. As such, Cavelle is responsible for the information contained on the website.

53. As set forth above, Cavelle published false and defamatory statements regarding Hollis.

54. Among other things Cavelle falsely stated that:

- A. Hollis has multiple children;
- B. Hollis has herpes;
- C. Hollis had transmitted an STD to an anonymous poster.
- D. Hollis was gay and or a bisexual; and
- E. Hollis' "crib is a dump," that he "wears dirty clothes," and

that he "complains about paying child support for his kids."

55. These statements constituted "defamation per se" under Pennsylvania law.

56. Cavelle published the defamatory statements with knowledge of the falsity of the statements and/or with reckless disregard as to the truth of the statements.

57. Cavelle failed to properly investigate the subject matter of the defamatory statements prior to publishing them.

58. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Cavelle acted with actual malice.

59. Cavelle refused to remove the defamatory statements from its website even after being notified that the statements were false, thus further demonstrating its malice in this case.

60. Cavelle abused any and all conditional privileges which it might have been entitled to assert, by failing to use reasonable care and diligence to ascertain the truth, before publishing the false communications and by acting with actual malice.

61. As a direct and proximate result of Cavelle's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

62. As a direct and proximate result of Cavelle's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

63. As a direct and proximate result of Cavelle's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

64. Cavelle has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

### Count III

#### Hollis v. Carolyn Merritt Lattimore

65. Plaintiff hereby incorporates paragraphs 1 through 64 above as if set forth in their entirety.

66. The Defendant, Carolyn Merritt Lattimore (Lattimore) is an individual who made anonymous postings on the dontdatehimgirl.com. website concerning Hollis.

67. As set forth above, Lattimore published false and defamatory statements regarding Hollis.

68. Among other things Lattimore falsely stated that:

- A. Hollis has multiple children; and
- B. Hollis has herpes.

69. These statements constituted "defamation per se" under Pennsylvania law.

70. Lattimore published the defamatory statements with knowledge of the falsity of the statements and/or with reckless disregard as to the truth of the statements.

71. Lattimore failed to properly investigate the subject matter of the defamatory statements prior to publishing them.

72. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Lattimore acted with actual malice.

73. Lattimore abused any and all conditional privileges which she might have been entitled to assert, by failing to use reasonable care and diligence

to ascertain the truth, before publishing the false communications and by acting with actual malice.

74. As a direct and proximate result of Lattimore's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

75. As a direct and proximate result of Lattimore's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

76. As a direct and proximate result of Lattimore's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

77. Lattimore has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

**Count IV**

**Hollis v. Alescia Roskov**

78. Plaintiff hereby incorporates paragraphs 1 through 77 above as if set forth in their entirety.

79. The Defendant, Alescia Roskov (Roskov) is an individual who made anonymous postings on the dontdatehimgirl.com. website concerning Hollis.

80. As set forth above, Roskov published false and defamatory statements regarding Hollis.

81. Among other things, Roskov falsely stated that Hollis was gay and or bisexual.

82. These statements constituted "defamation per se" under Pennsylvania law.

83. Roskov published the defamatory statements with knowledge of the falsity of the statements and/or with reckless disregard as to the truth of the statements.

84. Roskov failed to properly investigate the subject matter of the defamatory statements prior to publishing them.

85. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Roskov acted with actual malice.

86. Roskov abused any and all conditional privileges which she might have been entitled to assert, by failing to use reasonable care and diligence to ascertain the truth, before publishing the false communications and by acting with actual malice.

87. As a direct and proximate result of Roskov's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

88. As a direct and proximate result of Roskov's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

89. As a direct and proximate result of Roskov's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

90. Roskov has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

**Count V**

**Hollis v. Anna Doe**

91. Plaintiff hereby incorporates paragraphs 1 through 90 above as if set forth in their entirety.

92. The Defendant, Anna Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

93. Hollis intends to learn the identity of Doe during discovery in this case.

94. As set forth above, Doe published false and defamatory statements regarding Hollis.

95. Among other things Doe falsely stated that Hollis gave her an STD.

96. These statements constituted "defamation per se" under Pennsylvania law.

97. Doe published the defamatory statements with knowledge of the falsity of the statements.

98. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Doe acted with actual malice.

99. As a direct and proximate result of Doe's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

100. As a direct and proximate result of Doe's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

101. As a direct and proximate result of Doe's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

102. Doe has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

**Count VI**

**Hollis v. Barbara Doe**

103. Plaintiff hereby incorporates paragraphs 1 through 102 above as if set forth in their entirety.

104. The Defendant, Barbara Doe (Doe), is an as-yet unknown individual who made anonymous postings on the dontdatehimgirl.com. website.

105. Hollis intends to learn the identity of Doe during discovery in this case.

106. As set forth above, Doe published false and defamatory statements regarding Hollis.



107. Among other things Doe falsely stated that Hollis' "crib is a dump," that he "wears dirty clothes," and that he "complains about paying child support for his kids."

108. These statements constituted "defamation per se" under Pennsylvania law.

109. Doe published the defamatory statements with knowledge of the falsity of the statements.

110. By publishing defamatory statements with knowledge of their falsity or with reckless disregard as to their truth, Doe acted with actual malice.

111. As a direct and proximate result of Doe's conduct, Hollis has suffered embarrassment, humiliation and emotional distress which may be permanent in nature.

112. As a direct and proximate result of Doe's conduct, Hollis has suffered damage to his reputation, which may be permanent in nature.

113. As a direct and proximate result of Doe's conduct, Hollis' earning capacity has been impaired and/or may be impaired in the future.

114. Doe has intentionally and maliciously defamed Hollis. Such conduct was extreme and outrageous in character, entitling Hollis to punitive damages.

WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendant for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

**Count VII**

**Hollis v. Catherine Doe, Deborah Doe and Emily Doe**

115. Plaintiff hereby incorporates paragraphs 1 through 114 above as if set forth in their entirety.

116. Hollis believes and therefore avers that other unknown individuals may have posted false information about him on the dontdatehimgirl.com website.

117. Accordingly, Hollis reserves the right to amend his Complaint in the event that he learns the identity of any such individuals during discovery.

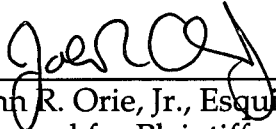
WHEREFORE, Plaintiff prays this Honorable Court to enter judgment in favor of the Plaintiff and against Defendants for compensatory damages in excess of \$50,000.00, as well as for punitive damages, interest and costs of suit.

**A JURY TRIAL DEMANDED**

Respectfully submitted,

ORIE & ZIVIC

By:

  
\_\_\_\_\_  
John R. Orié, Jr., Esquire  
Counsel for Plaintiff  
PA I.D. No. 21972  
2500 Lawyers Building  
Pittsburgh PA 15219  
(412) 281-3180  
(412) 232-0813 facsimile



**Ebony Guy**  
 Free to Join. 1000's of pictures & video's of Beautiful Ebony Singles  
 Ads by Goooooole

**Steelers Super Bowl frame**  
 Purchase a framed display featuring all 5 Steeler Championships  
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- SEARCH PROFILES
- DDHG PODCAST
- CONTACT US

### ALLEGED CHEATER

Todd Hollis



This guy is a trip. In fact, screw trip, he's a DOG. He dated one of my friends....that was before she found out that he had dated half of Pittsburgh. Generally only dates light skinned women. This one is an attorney, ladies. He seems professional and smooth and will hit you with how he gave his mother his kidney (\*its true, he did--you can find it on the post gazette along with mention of yet another girlfriend). He frequents clubs and tries to fly under the radar because he's got such a bad rap. He has a kid (or kids--who knows). Often dresses shabbily for a lawyer--probably part of his disguise. He's in his 30s; AND he is believed to have HERPES. Stay away!

**Age** NA  
**Race** Black  
**Height** NA  
**Weight** NA  
**City** NA  
**Country**


LOGON


DDHG NEWSLETTER

EMAIL:

SUBMIT

### SEND THIS PROFILE TO A FRIEND

**your Name**

**your Email**

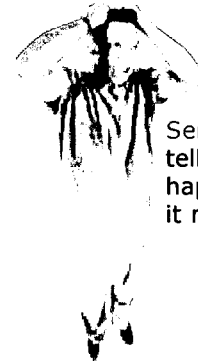
**Friends Name**

**Friend Email**

**Your Message**

Send

### MEN TELL US YOUR SIDE OF THE STORY



Send us an email, tell us what happened. We'll post it next to your profile

< return





HOME ABOUT US MEMBER FORUMS SEARCH PROFILES DDHG PODCAST CONTACT US

ALLEGED CHEATER

Todd Hollis

I used to date this guy and heard he was gay, i'm quite sure he is bi. I remember his father George asking him if he was.

Age 38
Race Black
Height 6 ft 1 in
Weight 175
City NA
Country

SEND THIS PROFILE TO A FRIEND

Form with fields for your Name, your Email, Friends Name, Friend Email, Your Message, and a Send button.

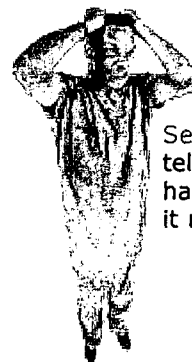
< return

Blurred registration or login form area.

SHOP DDHG banner with a logo and text.

DDHG NEWSLETTER sign-up form with an EMAIL field and a SUBMIT button.

MEN TELL US YOUR SIDE OF THE STORY



Send us an email, tell us what happened. We'll post it next to your profile





**Catch your husband**

Install a low cost GPS tracking system in their car. Catch Him!

Ads by Google

**Find a Girlfriend**

Thousands of singles in your area. Find your match for free now!

Advertise on this site

- HOME
- ABOUT US
- MEMBER FORUMS
- SEARCH PROFILES
- DDHG PODCAST
- CONTACT US

**ALLEGED CHEATER**

Todd Hollis

Do NOT DATE HIM. He gave me an STD and dated 2 people at a time.

**Age** 37  
**Race** Black  
**Height** 6 ft 2 in  
**Weight** NA  
**City** NA  
**Country**

**SEND THIS PROFILE TO A FRIEND**

**your Name**   
**your Email**   
**Friends Name**   
**Friend Email**   
**Your Message**

< return


LOGON

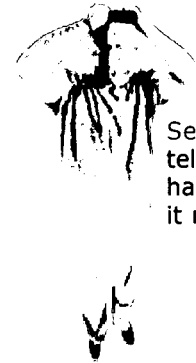
STOP DDHG



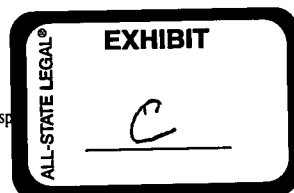
DDHG NEWSLETTER

EMAIL

**MEN TELL US YOUR SIDE OF THE STORY**



Send us an email, tell us what happened. We'll post it next to your profile





HOME ABOUT US MEMBER FORUMS SEARCH PROFILES DDHG PODCAST CONTACT US

ALLEGED CHEATER

todd hollis

Dark and handsome ladies, he looks like a chocolate dream. Until you get to know him. His crib is a dump. He wears dirty clothes all the time. He's an attorney but you would never think so cause he complains about paying child support for his kids. He got hook-ups in every zipcode in the USA. He's hot....DON'T LET HIM FOOL YOU GIRL!

Age 37
Race Black
Height 6 ft 2 in
Weight 175
City NA
Country

SEND THIS PROFILE TO A FRIEND

Form with fields for: your Name, your Email, Friends Name, Friend Email, Your Message, and a Send button.

< return

Blacked out registration form with a LOGON button.

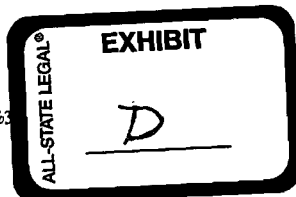
SHOP DDHG banner with a logo and text: CHECK OUT OUR NEW G-SHOP!

DDHG NEWSLETTER sign-up form with an EMAIL field and a SUBMIT button.

MEN TELL US YOUR SIDE OF THE STORY




Send us an email, tell us what happened. We'll post it next to your profile



**VERIFICATION**

I verify that the facts set forth in this Complaint In Civil Action are true and correct to the best of my information and belief. I understand that false statements herein are made subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities.

Date: 6/28/06

  
\_\_\_\_\_  
Tedd Hollis

**CERTIFICATE OF SERVICE**

I, John R. Orié, Jr., Esquire, of the law firm of Orié & Zivic, hereby certify that the within Complaint in Civil Action was served this 29<sup>th</sup> day of June, 2006 on all interested parties in the manner stated below, and addressed as follows:

Robert L. Byer, Esquire  
Duane Morris LLP  
600 Grant Street, Suite 5010  
Pittsburgh, PA 15219

*Counsel for Defendants Tasha  
C. Joseph and Empress Motion Pictures  
d/b/a The Cavelle Company, Inc.*

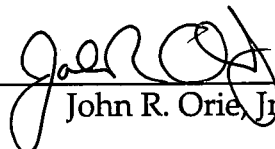
(Via Hand Delivery)

Carolyn Meritt Lattimore  
471 Walnut Street  
Blawnox, PA 15238

(To be served via Allegheny County Sheriff's Office)

Alescia Roskov  
531 Franklin Avenue  
Pittsburgh, PA 15221

(To be served via Allegheny County Sheriff's Office)

  
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John R. Orié, Jr., Esquire